

MUSSEY GRADE ROAD ALLIANCE DATA REQUEST: MGRA-SDGE-02
2021 WILDFIRE MITIGATION PLAN UPDATE
SDG&E RESPONSE

Date Received: January 25, 2021
Date Submitted: February 10, 2021

I. GENERAL OBJECTIONS

1. SDG&E objects generally to each request to the extent that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. No information protected by such privileges will be knowingly disclosed.
2. SDG&E objects generally to each request that is overly broad and unduly burdensome. As part of this objection, SDG&E objects to discovery requests that seek “all documents” or “each and every document” and similarly worded requests on the grounds that such requests are unreasonably cumulative and duplicative, fail to identify with specificity the information or material sought, and create an unreasonable burden compared to the likelihood of such requests leading to the discovery of admissible evidence. Notwithstanding this objection, SDG&E will produce all relevant, non-privileged information not otherwise objected to that it is able to locate after reasonable inquiry.
3. SDG&E objects generally to each request to the extent that the request is vague, unintelligible, or fails to identify with sufficient particularity the information or documents requested and, thus, is not susceptible to response at this time.
4. SDG&E objects generally to each request that: (1) asks for a legal conclusion to be drawn or legal research to be conducted on the grounds that such requests are not designed to elicit facts and, thus, violate the principles underlying discovery; (2) requires SDG&E to do legal research or perform additional analyses to respond to the request; or (3) seeks access to counsel’s legal research, analyses or theories.
5. SDG&E objects generally to each request to the extent it seeks information or documents that are not reasonably calculated to lead to the discovery of admissible evidence.
6. SDG&E objects generally to each request to the extent that it is unreasonably duplicative or cumulative of other requests.
7. SDG&E objects generally to each request to the extent that it would require SDG&E to search its files for matters of public record such as filings, testimony, transcripts, decisions, orders, reports or other information, whether available in the public domain or through FERC or CPUC sources.
8. SDG&E objects generally to each request to the extent that it seeks information or documents that are not in the possession, custody or control of SDG&E.
9. SDG&E objects generally to each request to the extent that the request would impose an undue burden on SDG&E by requiring it to perform studies, analyses or calculations or to create documents that do not currently exist.

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10. SDG&E objects generally to each request that calls for information that contains trade secrets, is privileged or otherwise entitled to confidential protection by reference to statutory protection. SDG&E objects to providing such information absent an appropriate protective order.

II. EXPRESS RESERVATIONS

1. No response, objection, limitation or lack thereof, set forth in these responses and objections shall be deemed an admission or representation by SDG&E as to the existence or nonexistence of the requested information or that any such information is relevant or admissible.
2. SDG&E reserves the right to modify or supplement its responses and objections to each request, and the provision of any information pursuant to any request is not a waiver of that right.
3. SDG&E reserves the right to rely, at any time, upon subsequently discovered information.
4. These responses are made solely for the purpose of this proceeding and for no other purpose.

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Utilities are required to provide data upon request to stakeholders under WSD-001. At the request of the Wildfire Safety Division, utilities have begun to provide GIS data to WSD in geodatabase format via a secure Commission website, with updates provided as part of quarterly reports.

As per WSD-011, utility data is provided in quarterly reports so that analysis can be “frontloaded” prior to the issuance of the Wildfire Mitigation Plans.¹ IOUs provided GIS data to WSD in September and December 2020.

Data request are being issued to SCE, PG&E, and SDG&E, and follows up on the previous requests. Response time specified in WSD-01 is three business days, with exceptions requiring notification of the Wildfire Safety Division director.

Unless otherwise indicated, incident data is being requested for 2020, 2019, and prior years. If any of this data was disclosed in previous data requests by MGRA and other parties, please provide a link to it.²

III. RESPONSES

QUESTION 1:

Please provide the most recent available geodatabase comprised of the non-confidential portion of the GIS data uploaded to the WSD website containing **PSPS Event records including specifically all perimeter, timing, and damage data** that is reported to WSD and to the Safety Enforcement Division as part of PSPS event reporting. Damage records should include at the least location, type of damage, any photos, and date and time of report. Customer meter records may be omitted from the data response.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, and 9. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 1:

Please refer to “MGRA_SDGE_DR2.gdb” and “MGRA_SDGE_DR2_PSPS_damage_photos.zip.”

¹ WSD-011; Attachment 2.1; p. 1 – “Accordingly, the WSD will consider these four key elements for the 2021 WMP Update submission and review process: 1. Frontload data collection. This would extend the timeframe for WSD and stakeholder review of relevant utility data in advance of the WMP submission and review period, in addition to reducing the need for follow-up data requests. This means some data is collected prior to the annual WMP through Quarterly Reports...”

² Note, SDG&E has provided outage and ignition data for 2020 and does not have to re-supply this data or any link to it.

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QUESTION 2:

Please provide the most recent available geodatabase comprised of the non-confidential portion of the GIS data uploaded to the WSD website containing **ignition data** that is reported to WSD as part of *risk* event reporting. Please provide entire the historical data set available within the database.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, and 9. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 2:

Please refer to “MGRA_SDGE_DR2.gdb.”

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QUESTION 3:

Please provide the most recent available geodatabase comprised of the non-confidential portion of the GIS data uploaded to the WSD website containing **outage data** that is reported to WSD as part of *risk* event reporting. Please provide entire the historical data set available within the database.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, and 9. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 3:

Please refer to “MGRA_SDGE_DR2.gdb.”

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QUESTION 4:

To the extent that there are any records or fields considered confidential in the above datasets, please provide a list of the type of record (for example, transmission with voltage above 200 kV) and specific fields that are considered confidential, including explanation and legal justification for why the particular type of record or field is considered confidential.

OBJECTION:

SDG&E objects to this request on the grounds set forth in General Objection Nos. 2, 5, and 9. Subject to the foregoing objections, SDG&E responds as follows.

RESPONSE 4:

No confidential information is provided in “MGRA_SDGE_DR2.gdb” or “MGRA_SDGE_DR2_PSPS_damage_photos.zip.”